IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

GEOTAG, INC.,

Plaintiff,

v.

No. 2:10-CV-265-JRG

FRONTIER COMMUNICATIONS

CORP., et al.

Defendants.

DEFENDANT CITYGRID MEDIA, LLC'S UNOPPOSED MOTION TO EXTEND <u>PRODUCTION DEADLINE</u>

Defendant CityGrid Media, LLC ("CityGrid") files this Unopposed Motion to Extend the Production Deadline as ordered by the Court to produce e-mails. The Court previously ordered that defendants produce emails by September 10, 2013. Since the Court issued its order, CityGrid has been working to comply with the Court's order. However, due to unexpected technical difficulties, CityGrid's email system has been unable to process search queries during this time that it is ordinarily able to process. Despite working diligently to resolve this technical problem, CityGrid has been unable to search any emails to date. CityGrid has discussed this issue with GeoTag, and GeoTag does not oppose an extension of time until September 13, 2013 for CityGrid to produce emails.

This request of time will not delay this case or affect other pre-trial deadlines or the trial and should not impact or delay the Court calendar or prejudice any party.

WHEREFORE, CityGrid respectfully requests that the deadline to produce emails be extended to and include September 13, 2013.

Dated: September 5, 2013 Respectfully submitted,

/s/ Irene Yang

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ATTORNEYS FOR DEFENDANT CityGrid Media, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic serivce are being served a copy of DEFENDANT CITYGRID MEDIA, LLC'S UNOPPOSED MOTION TO EXTEND PRODUCTION DEADLINE via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 5, 2013.

By: <u>/s/ Irene Yang</u> Irene Yang